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Attorneys for Plaintiff MARK SNOOKAL

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,)	CASE NO.: 2:23-cv-6302-HDV-AJR
)	
Plaintiff,)	DECLARATION OF OLIVIA
)	FLECHSIG RE: PLAINTIFF MARK
)	SNOOKAL'S PRETRIAL
vs.)	DESIGNATIONS OF THE
)	DEPOSITION OF DR. UJOMOTI
)	AKINTUNDE
CHEVRON USA, INC., a California)	
Corporation, and DOES 1 through)	<i>[Filed Concurrently with Plaintiff's</i>
10, inclusive,)	<i>Pretrial Designations of the Deposition</i>
)	<i>of Dr. Ujomoti Akintunde]</i>
)	
Defendants.)	District Judge: Hon. Hernan D. Vera
)	Magistrate Judge: Hon. A. Joel Richlin
)	Action Filed: August 3, 2023
)	Trial Date: August 19, 2025
)	

DECLARATION OF OLIVIA FLECHSIG

I, Olivia Flechsig, declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am an associate with the law firm Allred, Maroko & Goldberg, counsel of record for Plaintiff Mark Snookal. As such, I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently to such facts under oath.

2. I make this declaration in support of Plaintiff's Pretrial Designations of the Deposition of Dr. Ujomoti Akintunde.

3. I am informed and believe that lawyers for Defendant Chevron USA, Inc. represent defense witness Dr. Ujomoti Akintunde for the purposes of this case. I am further informed and believe that Dr. Akintunde is a current employee of Chevron Nigeria Ltd. These facts were stated during Dr. Akintunde's deposition.

4. On Saturday, August 16, 2025, Mr. Mussig emailed notifying us for the first time that they would not be making Dr. Akintunde available to testify until Friday, August 22, 2025. Attached hereto as Exhibit A is a true and correct copy of this email thread with Mr. Mussig discussing witness availability and deposition designations.

5. Prior to this, Defense counsel represented, including at the Final Pretrial Conference, that they would produce Dr. Akintunde at trial without a subpoena (if only via Zoom because Dr. Akintunde is located in Nigeria).

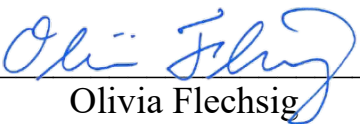
6. In light of the schedule of the trial as noted in the Court's Minute Order Re: Pretrial Conference Proceedings (Dkt 97), including allotting "a total trial time of nine (9) hours per side" it is likely that Plaintiff will rest before Friday morning—the only time when Defendant will make her available.

7. I am cognizant of the Court's August 14, 2025 deadline to submit deposition designations (Dkt 97).

8. However, today is the first court day on which we could file these

1 designations since learning from Defendant that Dr. Akintunde may not timely be
2 available to Plaintiff to offer her live testimony. Accordingly, we are doing so now.

3 I declare under penalty of perjury under the laws of the State of California
4 that the foregoing is true and correct, and that this Declaration was executed on
5 August 18, 2025, at Los Angeles, California.

6
7
8 
9 Olivia Flechsig